

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-11

JUN 0 5 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

GENERAL PETROLEUM, INC. 3919 MOBILE FORT WAYNE, IN 46805

Re: Wayne Reclamation and Recycling ("Site") Columbia City, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site. A Remedial Investigation/Feasibility Study (RI/FS) of the Site has been completed. This action was undertaken pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCIA).

In accordance with the requirements of Section 104(b) of CERCIA, the Remedial Investigation (RI) Report describes findings on the nature and extent of contamination at the Site. The Feasibility Study (FS) Report considered alternatives necessary to address the conditions at the Site. Along with the FS Report, U.S. EPA issued a Proposed Plan for a thirty day public comment period which ended February 21, 1990. On March 30, 1990, the Regional Administrator issued a Record of Decision (ROD) selecting the remedial action which was originally proposed (See Attachment III) for the Site.

Unless the U.S. EPA determines that a potentially responsible party (PRP) will voluntarily undertake the remedial action necessary at the Site, U.S. EPA may, under Section 104 of CERCIA, undertake the remedial action itself and, under Section 107 of CERCIA, seek reimbursement from PRPs of all response costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities.

Moreover, under Section 106 of CERCIA, U.S. EPA may order responsible parties to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare or environment from an imminent and substantial

EPA of the status of those discussions or actions in a response to this letter and to provide a copy of this response to any other parties involved in those discussions or actions. Your response letter should be sent to:

Tinka G. Hyde, 5HS-11 U.S. Environmental Protection Agency 230 South Dearborn Street Chicago, Illinois 60604

Pursuant to Section 122(e)(1) of CERCIA, the U.S. EPA has determined that a period of negotiation may facilitate an agreement with you and other PRPs. Upon initiation of the negotiations moratorium period, you will have a maximum of 60 days to coordinate with any PRPs and to present to U.S. EPA a "good faith" proposal for implementing and conducting the remedial action recommended in the Proposed Plan. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of all other PRPs to whom this notification is being sent and the names and addresses of the RI/FS PRP Steering Committee. This list is appended as Attachment II to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), has previously been provided to the steering committee.

In accordance with the requirements of Section 122(e)(2), during the 60 day calendar period, beginning June 28, 1990, the U.S. EPA will not commence remedial action at the Site. U.S. EPA may, however, commence any additional studies or investigations authorized under Section 104(b), including remedial design, during this negotiation period. If U.S. EPA receives from the PRPs within the 60 day calendar period a written "good faith offer" which demonstrates the PRP's qualifications and willingness to conduct and/or finance the remedial design and remedial action (RD/RA) consistent with U.S. EPA's Proposed Plan, U.S. EPA will extend its moratorium on commencement of the remedial action work an additional 60 calendar days. The Proposed Plan, which recommended the remedy that was chosen by the Regional Administrator in the ROD, is appended as Attachment III.

The purpose of the additional time is to allow the PRPs and the U.S. EPA a period of time to finalize the settlement. A "good faith offer" for RD/RA should include the following:

- a statement of the PRPs' willingness to conduct and/or finance the RD/RA which is generally consistent with U.S. EPA's Proposed Plan or which provides a sufficient basis for further negotiations in light of U.S. EPA's Proposed Plan;
- a detailed "statement of work" or "workplan" identifying how PRPs plan to proceed with the work;

- a demonstration of the PRPs' technical capability to undertake the RD/RA. This should include a requirement that PRPs identify the firm they expect will conduct the work or that PRPs identify the process they will undertake to select a firm.;
- a demonstration of the PRPs' capability to finance the RD/RA;
- a statement of the PRPs' willingness to reimburse U.S. EPA for past response and oversight costs; and
- the name, address, and phone number of the party or steering committee who will represent the PRPs in negotiations.

Except in extraordinary circumstances explained in a written request, no extension to this 60 day period will be granted by the U.S. EPA. If a "good faith" proposal is not received within 60 calendar days, the U.S. EPA, pursuant to section 122(e)(4), may proceed to undertake such further action as is authorized by law, including implementation of the remedial action utilizing public funds available to the Agency.

To further facilitate your and any other PRPs' ability to present a "good faith" proposal within the 60 day time limit, the Agency has set up a meeting to provide information that will assist the PRPs in that effort. Toward that end, a draft Consent Decree and Statement of Work (SOW) will be provided to those persons attending this meeting. The details for the meeting are as follows:

Thursday, June 28, 1990 10:30 a.m. Fort Wayne, Indiana Holiday Inn, Grand Ballroom 300 E. Washington Blvd. (219) 422-5511

Additionally, the draft Consent Decree was provided to the State of Indiana. These revisions will be forwarded to the PRPs as they become available. Please note that the draft consent decree and scope of work, though already partly tailored for the purpose of exploring settlement possibilities with you at this particular site, are subject to changes based on the current, ongoing review of these documents by the Department of Justice.

An Administrative Record containing documents that form the basis for the Agency's decision on the selection of the remedy is available for public inspection at U.S. EPA - Region V office in Chicago, Illinois or at the information repositories located at the Columbia City Hall and Peabody Library in Columbia City, Indiana.

If you need further information regarding this letter, you may contact

Tinka Hyde of the Remedial and Enforcement Response Branch at (312) 886-9296. If you have an attorney handling your legal matters, please direct his or her questions to Elizabeth Doyle of the Office of Regional Counsel, U.S. EPA, Region V, at (312) 886-7951.

By a copy of this letter, the U.S. EPA is notifying the State of Indiana and the Natural Resources Trustees, in accordance with Section 122(j) of CERCIA, of its intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

If you have not already done so, the U.S. EPA strongly encourages you to take immediate steps to organize into a Committee to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,

John Kelley, Acting Chief

Remedial and Enforcement Response Branch

Enclosures

cc: Sheila Huff, DOI
Doug Fisher, IDEM
Tom Mariani, DOJ
Patrick Ralsdon, IDNR
Environmental Defense Section, DOJ
Indiana Attorney General
Dan Sparks, USFW

ATTACHMENT I

- A. U.S. EPA has evaluated a body of evidence in connection with its investigation of the Site, specifically, State of Indiana, SPC-17 Liquid Waste Removal Record Hauler Reports pertaining to the Site. Based on this evidence, U.S. EPA has information indicating that you are a potentially responsible party with respect to this Site.
- B. The current PRP Group has conducted the following studies and/or activities at the Site.
 - 1. 1986 Removal Action removed and disposed of contaminated soil, disposal of contents of 215-55 gallon drums and backfill of excavated areas.
 - 2. Remedial Investigation to determine the nature and extent of contamination at the Site.
 - 3. 1988 Removal Action conducted by a group of 5 PRPs, removed and disposed of additional contaminated soil and drums, disposal of 23 horizontal tank contents, and fencing.
 - Feasibility Study to evaluate the feasibility of possible alternatives to remediate the Site contamination identified during the Remedial Investigation.
 - 5. U.S. EPA released it's Proposed Plan for the site remediation on January 22, 1990.
 - 6. U.S. EPA issued it's Record of Decision for the WRR site remediation on March 30, 1990.
- C. Past Costs: As of October 17, 1989, \$622,066.58 have been expended by U.S. EPA at this Site. The PRPs have been billed for oversight costs and to date have paid \$56,588.02 towards their bills. Therefore, past costs incurred by the U.S. EPA as of October 17, 1989 are \$565,478.56. Following that date, U.S. EPA has incurred, and will incur, additional response costs regarding the WRR site.

ATTACHMENT II

The names and addresses of all parties receiving a copy of this letter are attached.

CURRENT WRR PRP GROUP STEERING COMMITTEE

William N. Hall Breed, Abbott & Morgan 1875 Eye Street, N.W. Washington, D.C. 20006 (202)466-1118

Christopher J. Dunsky Honigman Miller Schwartz and Cohn 2290 First National Building Detroit, Michigan 48226 (313) 256-7872

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54 900116
WARNER & SONS CONTRUCTIONS
29099 U.S. HIGHWAY 33 W
ELKHART, IN_46516

57 900116 A. HATTERSLEY 6 SON P.O. BOX 5366 3939 HOBILE AVENUE PORT WAYNE, IN_46695

60 900116 ALECTRICO, INC. 55800 CURRANT ROAD P.O. BOI 690 MISHAWAKA, IW_46544

63 900116 AHOCO OIL COMPANT 200 E. RANDOLPH DRIVE CHICAGO,IL_60601

66 900116
MARTHA RUBBELLS HOTER
SR. ATTORNET, AND PIPELINE CO.
500 REMAISSANCE CENTER
C/O ONE WOODARD AVE.
DETROIT, HI_48263

69 900116 ASHLET WARD, INC. 56883 BLEMART COURT ELKHART, IN_46516

72 900116
BASTIAN PLATING CO., INC.
625 W. 15TH STREET
AUBURN, IN_46706-2133

49 900116 TRUMBALL & SONS P.O. BOX 87 LARNILL, IN_46764

52 900116 UNITED TOOL P.O. BOX 1352 ELKHART, IN_46575

SS 900116
WEIL-MCLAIN
DIVISION OF MARLEY CO.
BLAINE STREET
MICHIGAN CITY, IN_46360

50 900116 ACTIVE PRODUCTS CORP. BERBERT A. SPITZER, JR. ATTORNET AT LAW P.O. BOX 927 HARIOW, IN_46852

61 900116
GARY CROUTE
ALUMINUM COMPANY OF AMERICA
1501 ALCOA BUILDING
PITTSBURGM, PA_15219

64 900116 ANACONDA POURR CABLE CORPANY BAST EIGHTH HARION, IN_46952

67 900116 APOLLO DISPOSAL P.O. BOX 410 AMGOLA,IM_46703

70 900116 AUSTIN PETROLEUM 99 E. JOE STREET HUNTINGTON, IN_46750

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U.S. GRANULES
P.O. BOY 130
1433 WESTERN AVENUE
PLYROUTH, IM_46563

53 900116 WALKER MFG. P.O. BOE 352 LIGONIER, IN_46767

56 900116 TODER DIL P.O. BOE 10 ELKHART, IN_46515

59 900116 ALBION WIRE P.O. BOX 156 STATE ROAD & CAST ALBION,IM_46701

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MR. REECE PRATHER
AMCAST IMDUSTRIAL CORPORATION
P.D. BOX 96
DAYTOM, OM_45431

65 900116 ANGLIM COMPANIES, INC. 1402 W. MAIN FORT NATHE, IN_46808

60 900116 ARLD SMITH RURAL ROUTF 5 COLUMBIA CITY, IN_45725

71 900116
BPC BFG.
DIVISION OF BRISTOL CORP.
1755 N. OAK BOAD
PLYBOUTH, IN_4553-0591

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BLUFFTON	POWER PLANT
514 E. MA:	SHINGTON
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76 900116 BOCK PRODUCTS 1901 W. HIZELY ELKHART, IN_46517 74 900116
CHARLES V. CHAFFEE, PRESIDENT
HLUFFTON RUBBER CO., INC.
P.O. BOK 255
BLUFFTON, IN_46714

78 900116 BREMAN CASTING 500 N BALTINGRE BREMAN, IN_46506 79 900116
CHARLES R. CAMPBELL
PLANT ENGINEER, BRODERICK CO.
500 LINCOLN STREET
DIVISION OF HARSCO CORPORATION
HUNCLE, IN 47302

J7 900116 LINDA J. SZEMBRUCH BORG-NARNER CORPORATION 200 SOUTH MICHIGAN AVENUE CHICAGO, IL_60604

81 900116
DARTE LAMBERT
C AND R BARREL PLATING CORP.
COLUMBIA CITY, IN_46725

02 900116 CARTER LUMBER COMPANY 5625 PENDELTON ANDRESON, IN_46011 90 900116 BUNGE CORP. OF INDIANA HIGHAY 25 P.O. BOK 180 LOGANSPORT, IN_45947-0188

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CHEHICAL LEWHAN TANKLINES
5606 SOUTH U.S. HIGHWAY 421
WESTVILLE, IN 46391

85 900116 CHEHSOLY, INC. 604 S. SCOTT P.O. BOX 1433 SOUTH BEND, IN_46624-1433 93 300116 CENTRE PROPERTIES, LTD. 19 S. LASALLE CHICAGO, IL_60603

87 900116 CITY REGINEER'S OFFICE WATER POLLUTION CONTROL CITY MALL PORT WATER, IN_86803 88 900116 CHI WABASH CAST, INC. P.O. BOX 668 WABASH,IN_46992 96 903116
TINOTRY J. BLOOM
CITY OF COLUMBIA CITY, CITY HALL
CHAUSCET STREET
COLUMBIA CITY, IN_46725

90 900116 DOMALD S. WOELPEL COLUELL/GENERAL, INC. P.O. BOX 329 FORT WANTE, IM_46801 91 900116
COLWELL/GENERAL, INC.
J. HICHARL O'NARA, ESQ.
P.O. BOY 2263
BARRETT, BARRETT 6 HCHAGHT
FORT WAYNE, IN_46801

89 900116
COACHNAM INDUSTRIES
601 E. BEARDSLET
ELXHARF, IN_46515

93 900116 RICHARD D. TEEPLR CODPER TIRE AND RUSSER COMPANY FINDLAY, DR. 45840 94 900116
RICHARD D. TREPLE
COOPER TIRE AND RUBBER COMPANY
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6600 N. CLINTON
FORT WAYNE, IM_46825

96 900116 COVER-ALL RENTAL SERVICE 3201 BROOKLYS AVENUE FORT WAYNE, IS_46809 97 900116 CRAME EDHUND 550 MORTH BROADWAY BUTLER, IN_46721 75 903116
RAYMOND C. HAHIER
DIVISION COUNSEL
CORNING GLASS WORKS
LEGAL DEPARTMENT
CORNING, NY_14831

99 900116 CUSTARD INSURANCE ADJUSTERS, INC. P.O. BOX 10479 100 900116 JOHN CANAN VICE PRESIDENT, FROINFERING 98 300116 FLIKABETH BOTTORFF AHLEMANN CTS CORPORATION FORT WATER, TH_46852

102 900116
DAYCO CORPORATION
1200 W. MICHIGAN AVENUE
THREE RIVERS, MI_49093

105 900116 DEKALB MOLDED PLASTICS U.S. MIGHWAY 6 WEST BUTLER, IM_46721

100 900116
DIESTER MACHINE
1933 E. WAYNE STREET
PORT WAYNE, IN_46803

111 900116
DOUGLASS CONSTRUCTION CO., INC.
4777 REED ROAD
FORT WAYNE, IN_46815

114 900116 E-REC-TO P.O. BOX 846 HISMANAKA, IM_46544

117 900116
EDGERTON HETAL PRODUCTS, INC.
219 E. BENERT
EDGERTON, ON_43517

120 900116
HILES C. GERBERING
BARRETT, BARRETT & HCWAGWY
P.O. BOX 2263
ELECTRIC HOTORS & SPECIALTIES INC
FORT WATHE, IN_46801

123 900116
ELHHURST BUS-GARAGE
FORT WAYNE SCHOOL DISTRICT
6006 ARDHORE AVENUE
FORT WAYNE, IN_46809

P.O. BOX 1388
DALTON POUNDRIES, INC.
WARSAW, IN 46580

103 900116
LARRY L. TUCKER
DAYTON-WALTHER CORPORATION
600 EAST MIGHLAND AVENUE
NUMCIE DIVISION
MUNCIE, IN_47303

106 900116 STEVEN L. ARTUSI, ESQ. CORPORATE COUNSEL DE PUY P.O. BOX 388 WARSAW, IN 46560

109 900116
POTCO COPPER AIR TOOLS
4030 STATE ROUTE 18
EICRSVILLE, OR_43526

112 900116 DUYRR THSTROMENT 55 MARD WARARUSA, IN_46360

115 900116
ROBERT E. DRYDEN
ASSOCIATE COUNSEL, E-SYSTEMS INC.
P.O. DDE 660248
DALLAS, TE_75266

118 900116
RDON MACHINE DIVISION
SIMPSON INDUSTRIES, INC.
W. INDIANA
RDON,ON_43518

121 900116
BLEWART PRODUCTS CORP.
700 RAIMBON ROAD
GENEYA, IN_46740

124 900116 EPCO PRODUCTS P.O. BOX 387 WEN HAVEN, IN_46774 905 MORTH WEST HOULEVARD

101 900116 CLEMENT A. REVETTI LEGAL COUNSEL P.O. BOX 1000 DANA CORPORATION TOLEDO, OH_43697

134 900116 DEKALO CEMTRAL SCHOOL DISTRICT P.O. BOX 503 AUBURN, [N_46705

107 900116 MM. A. DIDIER & SONS 613 MIGH STREET P.O. BOX 10748 FORT WAYNE, IN 16853-0748

110 900116

MR. MORBERT P. STROBEL

MANUFACTURING ENGINEERING MANAGER

141 RAILROAD STREET

DOUGLAS COMPONENTS CORPORATION

BRONSON, HI_49028

113 900116
DINANIC POWER CORPORATION
RURAL ROUTE 2
P.O. BOE 148
OSSIAN, IN_46777

116 900116
RATHREN L. GOETZ, ATTOHNET
BAGLE-PICHER ENDUSTRIES, INC.
P.O. BOX 779
CINCINNATTI, OH_45201

119 900116 ELCO INDUSTRIES, INC. P.O. BOI 606 LOGANSPORT, IN_46947

122 900116 CITY OF SLKHART CITY MUNICIPAL BUILDING 229 5. 2ND. ELKHART, IM_46516 EXACTO, INC. OF SOUTH BEND 1137 S. LAPAYETTE P.D. BOX 597 SOUTH BEND, IN_44624

129 900116
FLEK STEEL INDUSTRIES, INC.
P.D. BOX 129
HEN PARIS, IM_46553

132 900116
RDY S. HOWAROUSKI
PRANKLIM BLECTRIC COMPANY, INC.
400 PAST SPRING STREET
BLUFFTON, IU_46714

135 900116 G.C.G. ENTERPRISES 2204 LIBERTY DRIVE MISHAWAKA, IS_46544

136 900116
THOMAS H. ARRSTRONG
COUNSEL-ENVIRONMENTAL ISSUES
GENERAL ELECTRIC COMPANY
PAIRFIELD, CT_06431

141 900116
DAVID C. LEE
STATE GENERAL COUNSEL & SEC.
P.O. BOX 407
GENERAL TELEPHONE COMPANY
WESTPIELD, IN_46704

144 900116
JOHN ROSS
VICE PRESIDENT ~ E.P.A.
111 EAST BROAD STREET
GRIPCO PASTENERS DIVISION OF NITE
SOUTH WHITZLY, IS_86787

147 900116
HENDRICKSON TANDEN CORP.
BOLER INVESTMENTS, INC.
P.O. BOX 927
KENDALLVILLE, IN_46755

150 900116 HOOK IND. SALES 2731 BROOKLYN AVENUE PORT WAYNE, IN_46804 LAUREN H. HORISTNY COMPORATE COUNSEL 2855 COOLIDGE BI-CELL-O CORP. TROY, HI_46084

130 900116
PORT WATHE AIR SERVICE
(RA) JOHN DILLET
4021 AIR ST. BARRFIELD
PORT WAYNE, IN 46809

133 900116
PREEMONT MPG.
DIVISION OF SIMPSON IND. INC.
5. TILLOTSON
PREMONT, IN_46737

136 900116
GRSOLINE EQUIPMENT SEV. Co., INC.
P.O. BOX 10474
FORT WATHE, IN_46652

139 900116
D. W. HOHRHAM
HAMAGER-ENVIRONMENTAL PROGRAMS
P.O. BOX 2230
GENERAL ELECTRIC COMPANY
FORY WAYNE, IN_46801

142 900116
GRUSTA SCREW HACHING PRODUCTS INC
U.S. 27 W.
P.O. BOS 241
ROUTE 1
GRUSTA, IN_46740

145 900116
MAGREMAN CONSTRUCTION CORP.
501 W. WASHINGTON BOULFVARD
PORT WAYNE, IN_46602

148 900116
HILLSDALE TOOL 6 HPG. CO.
135 E. SOUTH
HILLSDALE, HI_49242

151 900116 HOOVER DRAINAGE GRINN RORD HUNTINGTON, IN_46750 ESSEX INTERNATIONAL, INC.
UNITED TECHNOLOGY CORPORATION
UNITED TECHNOLOGY SUILDING
HARTFORD, CT_06101

128 900116 PLATLIW, INC. 1610 CIRCLE SOUTH BEND, IN_46628

131 900116
PORT WATHE WATER
POLLUTION CONTROL PLANT
2601 DWENGER AVENUE
FORT WATHE, IN_46803

- 134 900116 G-G SERVICE CO. GLENBROOK SQUARE SHOPPING CENTER FORT NATUR, IN_

137 900116
GATES CHEVROLET CORP.
401 5. LAPAYETTE
500TH BEND, IN 46601

140 900116 GENERAL PETROLEUM, INC. 3919 NOBILE PORT WATNE, IN_46805

143 900116 GENDYA, INC. 7034 E. COURT DAVISON, MI_48423

146 900116
TOM HARGETT
PRUBBAUF CORP.
LIQUID AND BULK TANK DIVISION
P.O. HOX 660
PORT WAYNE, IN_46801

149 900116
NOLNES AND COMPANY
607 EAST ELLSWORTH
P.O. BOX 370
COLUMBIA CITY, IN 46725

153 900116
ITT AEROSPACE/OPTICAL DIVISION
DIVISION OF ITT CORP.
P.O. BOI 3700
PORT WAYNE, IN_46801-3701

154 900116 INCO, INC. P.O. BOX 444 NUNTINGTON, IN_46750

156 900116
INDIANA DIE MOLDING
DIFISION OF NARNET INDUSTRIES INC
9100 FRONT STREET
FORT NAVNE, IN_46818-2209

157 900116
INDUSTRIAL PUEL OILS, INC.
1702 5. PAIRFIELD AVENUE
FORT WATHE, IN_46809

PROSPECT HEIGHTS, IL_60070.

155 900116
INDIANA AIR NATIONAL GUARD
BAER FIELO
FORT WAYNE, IN_46809

900116

HOUSEHOLD MANUPACTURING, INC.

ASSISTANT GENERAL COUNSEL

THOMAS L. ALDRICH

2703 SANDERS ROAD

152

159 900116
JAMESON CORP. OF INDIANA
209 W. ONIO STREET
P.D. BOX 247
EENDALLVILLE, IN_46755-2015

JIM EZELY BUICK, INC. 1819 S. CALHOUM FORT WAYNE, IN_46804 158 900116
INTERNATIONAL HARVESTER COMPANY
2701 COLISEUM BOULEVARD
P.O. BOX 596
FORT WAYNE, IN_46801

162 900116
JOSAN HANDPACTURING COMPANY
1508 EAST SECOND STREET
HICHIGAN, IN_46360

163 900116
JOT HANDPACTURING COMPANY
301 GRANT STREET
PITTSBURGH, PA_15219

. 161 900116 JOHNSON PRODUCTS 2100 STERLING AVENUE ELKHART, IN_46516

165 900116
KREAGER BROTHERS BICAVATING
RURAL ROUTE 1
CROMNELL, IN_46732

166 900116 KOOSTZ EQUIPHEST 6946 LILAC ROAD PLYNOUTR, IS 46563 164 900116

K. MART DISTRIBUTION CENTER
P.O. BOX 359
FORT WATNE, IN_46801

160 . 900116

RERR GLASS NAMBPACTURING CORP.
524 EAST CENTER
DUNKIRK,IN_47336

169 900116
LARDRH CORP.
REHEE R. HANNINHEY
11 S. HERIDIAN ST. SUITE 1313
BARNES AND THORNBURG
INDIANAPOLIS, IN_46204

167 900116

RIPCHEN QUIP, INC.

WILLIAN L. SWEET, JR.
P.O. BOX 2263

BARRETT, BARRETT 5 MCNAGNY
FORT WATNE, IN_46801

171 900116 (RA) GRME LOPSHIRE 401 M. PAIRPAK FORT WAYNE, IM_46807

172 900116
LIME CITY MPG. CO., INC.
1470 BYMA AVENUE
P.O. BOX 509
MUNTINGTON, IN_46750-3640

170 900116
RUPUS H. CRAIG, DIRECTOR OF LAW
MACHILLAN BLOEDAL, INC.
P.O. BOX 366
PINE HILL, AL_36/69

174 900116 LINCOLN MANUFACTURING COMPANY THE P.O. BOX 1229 FORT WAYNE, IN_46801 175 900116 LOBDELL-EMERY MFG. CO. 10850 17TH STREET ARGOS, CM_46501-9703 173 902116 LIMESTONE PRODUCTS, INC. P.O. BOX 618 PORTLAND, IN_4/371

177 900116
LIDELL, INC.,
ELASTOMER PRODUCTS GROUP
P.O. BOX 29
General

178 900116 ZANKK, INC. 100 PROGRESS WAY W. AVILLA, IN 46710 176 900116
LOCK JOINT THE COMPANY, INC.
1400 RIVERSIDE DRIVE
P.O. 10X 219
South Band, TNI 216626

GERBER STREET LIGONIER, IN_46767-0491

180 900116
THOMAS M. HAPMER, ESQ.
MAGNAVOX CONSUSHER ELECTRIC CO.
P.O. BOX 14810
HORTH AMERICAN PHILIPS COMPANY
KNOXVILLE, TN_37914

103 900116
MARTIN OIL
4501 127TH ALSIP
BLUE ISLAND, IL_60406

186 900116
MCCORD BEAT TRANSFER CORP.
500 W. MARRISON STREET
PLYNOUTH, IN_46563-1324

169 900116

MEANS SERVICE, INC.

(RA) CT CORP.

1 M. CAPITAL AVERUE

INDIANAPOLIS, IN_46240

192 900116
RISHAWAKA CITY SCHOOLS
1402 S. HAIN
HISHAWAKA, IN_46544

195 900116
HTERS SEPTIC SERVICE
ROUTE 3
LIGONIER, IN_46767

198 900116
HATIONAL MEAT TREATING CORP.
1621 S. HONROE
FORT MAYNE, IN_46803

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D.T. CARLTON
MAGNAVOX GOV. 6 INDUSTRIAL
1313 PRODUCTION ROAD
ELECTRONICS COMPANY
FORT WAYNE, IN_46808

184 900116
STEPMEN T. BENIS
ASSISTANT CORPORATE COUNSEL
21001 FAN BORN ROAD
NASOD INDUSTRIES, INC.
TAYLOR, NI_ 48180

167 900116
HCDOWELL ENTERPRISES, INC.
JAMES W. WOODSHALL, RSQ.
121 W. PRANKLIN STREET, STE 400
WARRICK, WEAVER, 8 BOYN
ELKHART, IN_46516

190 900116 HEEK HACK, IHC. 6529 HAPLEDOWNS DRIVE FORT WAYNE, IN_46815

193 900116 MOUSANTO 910 GERBER STREET LIGONIER, IN_46767

196 900116 MAAS FOOD RURAL ROUTE 5 PORTLAND, IN_47371

199 900116 MORPOLK & MESTERN RAILTWAY CO. 8111 MELSON ROAD FORT WAYNE, IM. 46803

202 900116
WORTHERN INDIANA PUBLIC SRYS. CO
5265 HOLMMAN AVENUE
HANNOND, IN _46320

SOUTH BEND, IN_46624

179 900116
ZOLLHER CORPORATION
HILES C. GERBERDING
P.O. BOX 2263
BARRETT, BARRETT & MCNAGNY
FORT WATNE, IN 46801

132 900116 MAPLEWOOD SHELL SERVICE 6132 STELLHORN ROAD FORT WATNE, IN_46815

135 900116
HATBRIALS HANDLING EQUIPMENT CORP
7433 US HIGHWAY 30 E.
PORT MATHE, IN_46803

156 900116
W.A. AILES
VICE PRESIDENT-TREASURER
909 N. LAPATETTE STREET
NCGILL HANDFACTURING CO. INC.,
VALPARAISO, IN_46383

191 900116

METALLURGICAL PROCESSING, INC.
3715 E. WASHINGTON BOULEVARD
P.O. BOX 10842
FORT WAYNE, IN_46854-0842

174 900116 MOORE BUSINESS PORMS WEST HILL ANGOLA, IN_46703

197 900116
R.M. RIVETNA, MANAGER
ENVIRONMENTAL ENGINEERING
B101 WEST HISGINS ROAD
HATIONAL CAN CORP.
CHICAGO, FN_60631

200 900116 NORTH AMERICAN VAN LINES, INC. 5001 U.S. HIGHWAY JO W. FORT WATNE, IN_46418

204 900116 ONTARIO PORGE CORPORATION 205 900116 ORTON-BCCULLOUGH CRANE 233 933116 0.F.C. MEDITAL SYSTEMS Onterto Fage Corporation
1200 MEST JACKSON STREET
P.O. BOK 2757
NUNCIE, IN_47303

207 900116 PHD CO. 4763 N. U.S. 24 E. HUNTINGTON,IN_46750-9617

210 900116
POORMAN'S MEATING AND AIR
CONDITIONAING SERVICE, INC.
1417 MARTIN
FORTY WAYNE, IN_46802

213 900116
R.J. RINA, SUPERVISOR
ENVIRONMENTAL APPAIRS
P.O. BOX 1348
PANNANDLE BASTERN PIPELINE COKANSAS CITY, NO_64141

216 900116
HONICA H. FORRHAM, SM. ATTORREY
R.R. DOWNELLEY 6 SONS
2223 MARTIN LUTHER KING DRIVE
CHICAGO,IL_60616

219 900116 RENCO OIL P.O. BOX 610 HISHAWAKA,IM_46544

222 900116 ROPPE RUBBER CORP. 101 INDUSTRIAL DRIVE ANGOLA, IN_46703-1045

225 900116 SEANCO 503 E. BROAD SOUTH WHITLEY,IN_46787

228 900116 SHELL CAR WASH 1001 W. 7TH AUBURN, IW_46706 Orton- Mc Cullough Crane P.O. BOX 846 HISHAWARA, IN_46544

204 900116
DAIME W. SKINNER
ASSISTANT RISK HANAGER
P.O. BOX 943
PRILLIPS INDUSTRIES, INC.
DATTON, ON_45401

211 900116
POWER PLANT SERVICE, INC.
2010 LAKEVIEW ROAD
PORT WAYNE, IN_45806-3922

214 900116
ROWALD R. RICHEY
PRECISION PLASTICS, INC.
P.O. BOK 329
COLUMBIA CITY, IM_46725

217 900116 RACO, INC. HARVEY RUSSELL, INC. P.O. BOX 4002 HISHAWAKA, IN_46755

220 900116 REBSBERGER OIL 1604 ROPEL SOUTH BEND, IN_46628

223 900116 RYDER TRUCK RESTAL FORT WAYNE LEASING P.O. DOX 419 FORT MAYNE, IN_46801

226 900116 SHAMBAN & CO., INC. 2531 BREMER DRIVE PORT WAYNE, IN_46803

229 900116 SMELLER GLOBE P.O. BOX 962 TOLEDO,OM_#3697 OEC. Medical Systems
501 ARJOHNE ROAD
MARSAN, IN_46580

206 900115 PAR-TEE COMPANY, INC. STATE ROAD ONE SPENCERVILLE, IN_46798

209 900116 PLYNUUTH COMMUNITY SCHOOLS 701 EAST BERKELEY STREET PLYNUUTH, IM_46561

212 900116 PRAIRTE VIEW LANDFILL P.O. BOX 128 WYATT, IN_46595

215 900116 PRINCO, INC. P.O. BOX 9782 FORT WATHE, IN_46899

216 900116 RECLAIMER, INC. P.O. BOK 610 MISHAWAKA, IN_46755

221 900116
ROCKWELL INTERNATIONAL
1001 W. CULVER ROAD
RNOY, IN_06530

224 900116
RYDER TRUCK RENTAL S LEASING
DISTRICT OFFICE
5225 NEW HAVEN AVENUE
FORT WAYNE, IN 46803

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258 900116 VITREOUS STEEL 900 E. WABASH AVENUE WAPPANEELIN 46550

261 900116
WABASH FIBRE BOI CO.
WESTON PAPER AND HFG. CO.
PERGUSON ROAD, BARR FIELD
PORT WAYNE, IN 46809

264 900116 JAH WATERS & ROGERS 7603 HELSO ROAD FORT WATHE, IM_46803

267 900116
WATHE HETAL PROTECTION CO.
1511 WARSH AVENUE
PORT WATHE, TE_46603-2146

270 900116 WOODALL 10261 S. INDIAN LAKE BOULEVARD INDIANAPOLIS, IN_46236 259 900116 YULCRAFT COUNTY ROAD 60 ST. JOE,IN_46765

262 900116 WABASH, INC. 411 E. SOUTH MONTINGTON, IN

265 900116
JOR WATKINS
RURAL ROUTE 4
PORT WATHE, IN_46819

268 900116
WATHE RECLAMATION & RECYCLING INC
LARRY BROCKMAN
P.O. BOX 467
DANIEL DRIVE
COLUMBIA CITY, IN_46725

271 900116
WORLD COLOR PRESS
CHEMICAL PLATE CORP.
P.O. BOX 1248
EPFINGUAN, IL_62401

257 909116 VALLEY MACHINE PRODUCTS 1840 BORNEMAN AVENUE ELKHART, FM_46517

250 900116 CMI , STOLLA HERBAN PARCO NOTEO OF NCISTATO P.O. BOX 466 OLO U.S. 24 W. 100 001466

263 900116 WALERED TOOL 1935 W. LUSHER ELEHART, IN_46517

266 900116
WATHE HOME EQUIPMENT
DIVISION OF SCOTT S PETZER
801 3LASGOW AVENUE
PORT WATHE, IN_\$6803-1344

269 900116 WHIFLEY PRODUCTS 1403 STANLEY DRIVE PLYNUTH, IN_46563

272 900116 XOLDI CORPORATION 6932 SETTISBURG PIKE FORT WAYNE, IN_46804

ATTACHMENT III

PROPOSED PLAN

WAYNE RECLAMATION AND RECYCLING SITE COLUMBIA CITY, INDIANA

WAYNE RECLAMATION AND RECYCLING PROPOSED PLAN COLUMBIA CITY, INDIANA

INTRODUCTION

This Proposed Plan identifies the preferred option for cleaning up the contamination at the Wayne Reclamation and Recycling (WRR) site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (U.S. EPA), the lead agency for the site activities, and the Indiana Department of Environmental Management (IDEM), the support agency for this response action. U.S. EPA, in consultation with the IDEM, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

U.S. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This document summaries information that can be found in greater detail in the Remedial Investigation (RI) and Feasibility Study (FS) reports and other documents contained in the administrative record file for this site. U.S. EPA and the State encourage the public to review these other documents in order to gain a more comprehensive understanding of the site and Superfund activities that have been conducted there. The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

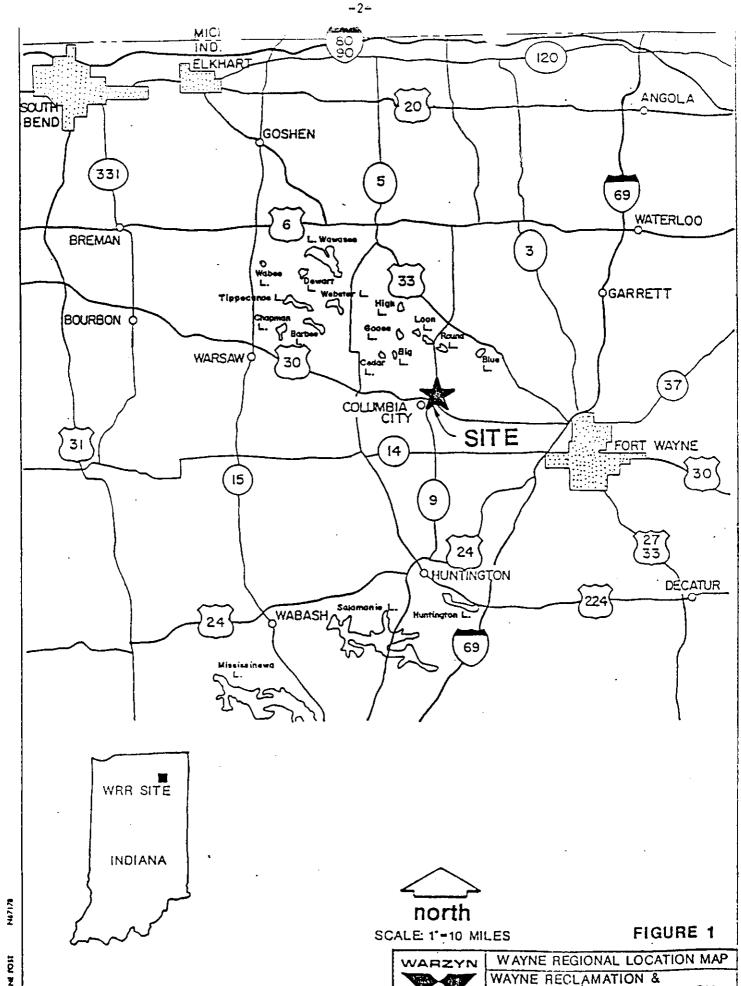
Peabody Library 203 N. Main Street Columbia City, Indiana 46725 Columbia City Hall 211 S. Chauncey Street Columbia City, Indiana 46725.

U.S. EPA, in consultation with the IDEM, may modify the preferred alternative or select another response action presented in the Plan and the RI/FS Reports based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives identified here.

SITE BACKGROUND

Site History

WRR is an approximately 30 acre site, located on the southeast edge of the Columbia City limits (Figure 1). It is bounded on the south and east by the Blue River and on the west and northwest by a cemetery and residential area. The site includes approximately 20 acres currently owned by WRR, 6 acres in the north which WRR sold to Holmes & Company in 1982, and 4 acres on the west owned by Columbia City.



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In 1975, WRR purchased approximately 25 acres of land on the southeast edge of Columbia City, including a 13.6 acre portion that Columbia City owned since 1953. WRR and its division, Wayne Waste Oil, began operating an oil reclamation business at the site in 1975. In 1980, the Indiana State Board of Health (ISBH) began investigating the WRR site as a result of reports from a former WRR employee that hazardous wastes were being illegally disposed of at the site. ISBH determined that between February 1979 and May 1980, WRR filed hauler reports stating that it had disposed of 250,000 gallons of sludge at the Williams County landfill in Bryan, Ohio. However, the landfill had not received any waste shipments from WRR during that time.

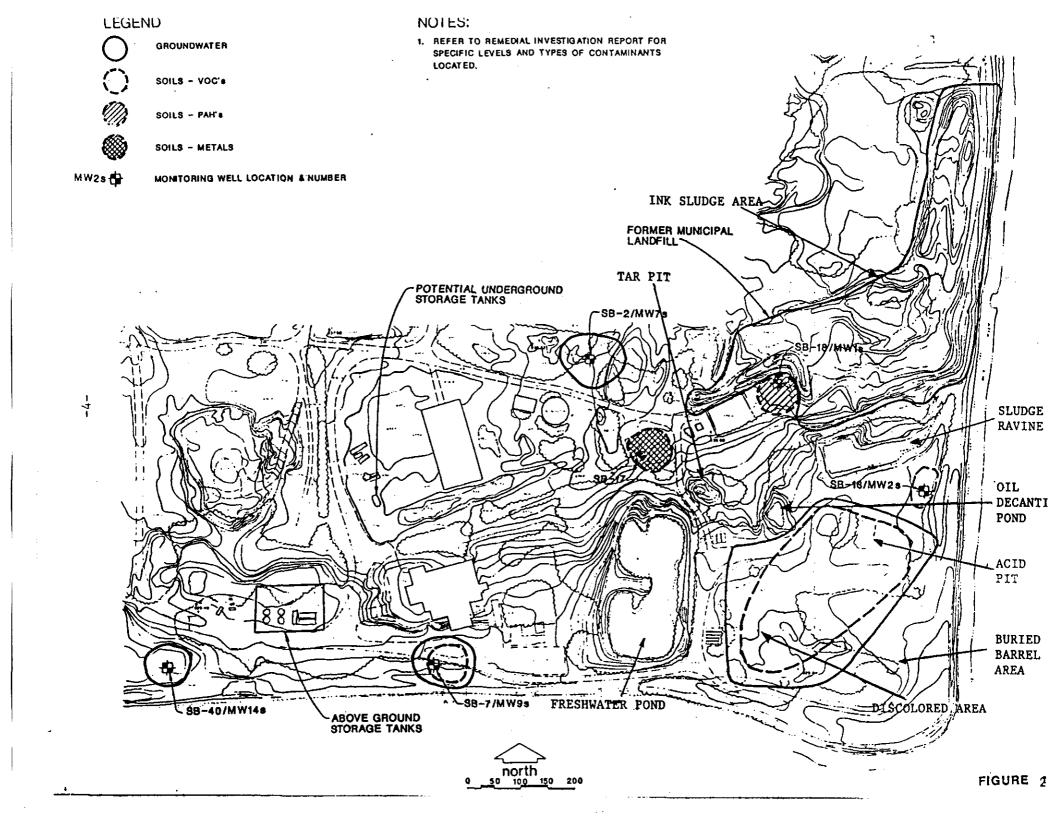
In 1982, WRR and one of its principals, Wayne Brockman, pleaded guilty to illegal "depositing of contaminants" and filing false hauler reports. They were required to pay a fine, to fund a risk assessment of the site, and to pay for cleanup. WRR did not perform the cleanup required under its guilty plea.

The site (Figure 2) can be divided into three major areas: the southeast portion designated as the lower floodplain; the northeast portion designated as an old City landfill area; and the central and west portion, known as the uplands. The lower floodplain includes the areas which have been identified as the "freshwater pond", "oil decanting pit", "tar pit", "sludge ravine", "discolored area", "buried barrel area" and "acid pit". The old City landfill which Columbia City operated from 1953 to 1970, is in the northeast part of the site. Also included in this area is the "ink sludge area". The upland area includes the now inactive WRR office buildings and numerous tanks.

In December, 1982, the WRR site was listed on the National Priorities List (NPL). On July 10, 1986, approximately 100 Potentially Responsible Parties (PRPs) entered into an Administrative Order by Consent with U.S. EPA to conduct a removal action at the site. Because the removal was not satisfactorily completed, a Unilateral Administrative Order was issued to a smaller group of PRPs on February 17, 1988, requiring them to complete a removal action.

On August 14, 1987, U.S. EPA entered into an Administrative Order by Consent with over 100 PRPs to conduct the RI/FS. The U.S. EPA and IDEM oversaw all facets of the investigations. The RI was conducted to determine the nature and extent of contamination and the FS evaluated the alternatives to prevent migration of the contaminants. Results of the RI, which was finalized in June, 1989, are as follows:

Surface soils in the area of the shooting range (SB-18) are contaminated with polynuclear aromatic hydrocarbons (PAHs).



- o The highest levels of volatile organic soil contamination were detected in the southwest area of the site along the Blue River (SB-7/MW9 and SB-40/MW14S); in the northern portion of the site west of the old City Landfill; and the southeast corner of the site. The major contaminants are chlorinated ethenes and to a lesser extent, chlorinated ethanes, toluene and alkanes.
- o The majority of groundwater contamination is caused by chlorinated ethanes and occurs in the same general location as the volatile organic soil contamination.
- o Magnesium, cadmium, copper, zinc, and lead were detected at levels above the ranges considered to be common in "natural soils." In general, the elevated levels of these compounds coincided with the areas described above for the volatile organic compounds. However, one apparently isolated area of considerably high concentrations of these elements (particularly lead) was detected approximately midway between the "freshwater pond" and the northern boundary of the site (SB-17/SB-17A). In addition, investigations in 1987, by the Technical Assistance Team (TAT) and the Environmental Response Team (ERT) found elevated levels of lead in the contents of four vertical and three horizontal tanks, located just west of the WRR office, and in the surrounding soils.
- concentrations of inorganic parameters in surface water and sediments from the Blue River adjacent to the site were not significantly above those upstream from the site boundary, with the possible exception of copper and zinc in sediments. A slight increase in cyanide concentrations was observed adjacent to the site as compared to upstream concentrations. Concentrations of inorganic parameters (particularly cyanide) in on-site surface waters were elevated in the wetland north of the site, "sludge ravine", and "oil decanting pit." Volatile organic compounds in on-site sediments were elevated in the three surface water locations previously mentioned, as well as in the "freshwater pond."
- o Although this was not discussed in the RI, the old City Landfill lacks appropriate cover to ensure compliance with RCRA Subtitle D regulations.

Scope and Role of the Response Action

The PRPs, under the direction of the U.S. EPA have already initiated two removal response actions at this site. Removal activities under the 1986 Administrative Order by Consent included excavation and disposal of contaminated soil in the "oil decanting pit", "tar pit" and "sludge ravine"; removal and disposal of the contents of 215 55-gallon drums and soil from the

"buried barrel area" and backfill. Backfilling remains to be done in the "oil decanting pit", "tar pit" and "sludge ravine". Removal activities under the 1988 Unilateral Administrative Order included excavation and disposal of contaminated soil from the "discolored area", "acid pit", "ink sludge area" and "sludge ravine"; removal and disposal of an additional 125 drums; removal and disposal of the contents of 23 horizontal tanks; fencing of the "oil decanting pit", "sludge ravine", and "discolored area"; and backfilling the "acid pit" and "ink sludge area" with off-site borrow.

This Proposed Plan addresses contaminated soil and groundwater in the lower floodplain and upland areas of the site; RCRA Subtitle D closure requirements for the old Columbia City landfill; and empty/clean/removal of the remaining tanks and debris which pose a threat to human health and the environment. These areas were determined to be a principal threat at the site because of the potential threat of direct contact with the soils and the soil's impact on the groundwater. The contaminated groundwater is a principal threat at the site because of the potential for direct ingestion of contaminants through municipal and private drinking water wells. This is the third and final response action for this site.

Summary of Site Risks

During the RI, an analysis was conducted to estimate the health or environmental problems that could result if the contamination at the WRR site was not cleaned up. This analysis is commonly referred to as a baseline Endangerment Assessment (Chapter 6 of the RI Report). In conducting this assessment, the focus was on the health effects that could result from direct exposure to the contaminants as a result of the soil coming into contact with the skin, or from direct ingestion of the soil. The Endangerment Assessment also focused on the health effects that could result from ingestion, inhalation, or direct contact with the skin of contaminated groundwater from a municipal or drinking water well.

Groundwater

The major contaminants of concern in the groundwater were Trichloroethylene (TCE) and vinyl chloride. TCE and vinyl chloride are volatile organic compounds that are known to cause cancer in laboratory animals and are therefore classified as carcinogens. TCE is a highly mobile contaminants that typically migrates through the soil into the groundwater.

The average concentrations of TCE and vinyl chloride found in the groundwater beneath the WRR site resulted in an excess lifetime cancer risk of 2×10^{-4} . This means that if no cleanup action is taken by U.S. EPA, two additional people per ten thousand have a chance of contracting cancer as a result of the exposure to

groundwater contaminated with TCE and vinyl chloride.

Soil

The major contaminants of concern in the soils were polynuclear aromatic hydrocarbons (PAHs) and Polychlorinated biphenyls (PCBs). PAHs and PCBs are also classified as carcinogens. PAHs tend to be relatively immobile contaminants that will typically remain in the soil for long periods of time.

Sampling of the on-site soil found that average concentrations of PAHs resulted in an excess lifetime cancer risk of 3 x 10^{-2} . This means that if no cleanup action is taken by U.S. EPA, three additional people per one hundred have a chance of contracting cancer as a result of the exposure to the PAH-contaminated soil.

These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to the soil and groundwater and the toxicity of the contaminants.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present an imminent and substantial endangerment to public health, welfare, or the environment.

SUMMARY OF ALTERNATIVES

Based on the findings in the RI report, the following remedial action objectives were established for the WRR site to ensure protection of human health and the environment:

Groundwater

- o Minimize potential future risk to public health from consumption of contaminated groundwater.
- o Control migration of contaminated groundwater to the Blue River water and sediment.
- o Reduce migration of subsurface soil contaminants to the groundwater

Contaminated Soil

- o Minimize risk to public health and environment from the direct contact with PCB and PAH contaminated surface soil.
- o Reduce potential for erosion and transport of contaminated surface and subsurface soil to the Blue River.

Municipal Landfill

Ensure adequate cover is present to prevent erosion and exposure of waste resulting in direct contact or washout to the river.

Surface and Subsurface Tanks and Contents

o Eliminate potential migration of tank contents to surface and subsurface soil and groundwater.

Common Elements

There are seven remedial action alternatives which have been developed to address the contamination at the WRR site. Except for the "No Action" alternative, all of the alternatives now being considered for the site would include a number of common components. Alternatives 2 through 7 include removal and/or treatment of the tank contents and capping of the municipal landfill in accordance with RCRA Subtitle D sanitary landfill closure requirements. Soil and groundwater in the vicinity of the tanks may require additional investigation to delineate the extent of contamination due to spills or leaks associated with the tanks. It is assumed that additional soil or groundwater contamination could be addressed in a similar manner used in other areas of the site.

A large amount of debris is scattered throughout the site. These materials should be evaluated and those determined to be solid waste can be consolidated and placed under the municipal landfill cap. Those materials determined to be contaminated with hazardous waste would need to be cleaned or disposed in accordance with RCRA.

Each alternative also includes groundwater extraction and treatment to health-based levels and MCLs. Long-term groundwater monitoring in compliance with requirements of RCRA Subpart F, 40 CFR Section 264.100 will be conducted to gauge the effectiveness of the selected remedy. In addition, erosion control provisions and deed restrictions are required. It should also be noted that the wastes at the WRR site were found to be sufficiently similar to RCRA-listed waste or RCRA-characteristic wastes to make RCRA relevant and appropriate.

Lead-contaminated soil was found in the vicinity of SB-17 and SB-17A. Although this contamination appears to be localized, the extent of remediation of this area will be determined based on additional sampling during the remedial design. Remediation of the lead-contaminated soil will be achieved by either soil washing or immobilization technologies.

A more detailed discussion of the remedial action alternatives is presented below. Costs, including annual operation and maintenance (O&M), for each alternative are also provided. All costs and implementation times are estimated.

Alternative 1: NO ACTION

Capital Cost: \$0
Annual O&M Cost: \$0
Present Worth: \$0
Time to Implement: None

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison. Under this alternative, U.S. EPA would taken no further action at the site to prevent exposure to the soil and groundwater contamination.

Alternative 2: GROUNDWATER EXTRACTION AND AIR STRIPPING/ COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,329,630
Annual O&M Cost: \$ 228,500
Present Worth: \$5,483,700
Time to Implement: 30 years

Given the presence of the municipal well field immediately north of the site, vertical hydraulic gradients are downward from the upper to lower aquifers when the municipal well is being used. Therefore, the groundwater extraction system would be designed to lower the water table approximately 3.5 feet so that groundwater gradients are upward even when the municipal wells are pumping. The extraction wells in the southeast area of the site would be located within a slurry wall in order to allow for lower extraction rates and to facilitate lowering of the groundwater table. Additional groundwater extraction wells would also be placed through the site in order to intercept all contaminated groundwater. Treated groundwater would be discharged to the Blue River. Discharge limits would be established in accordance with IDEM's NPDES program.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. VOC-contaminated soil will be capped in accordance with RCRA Subtitle C closure requirements to prevent the incidence of dermal contact and reduce contaminant migration to the groundwater via infiltration.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 3: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL FLUSHING WITH TREATED GROUNDWATER/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,248,230
Annual O&M Cost: \$ 236,700
Present Worth: \$5,110,848
Time to Implement: 15 years

The groundwater extraction and treatment system would be identical to the system described for Alternative 2. However, to reduce the time that the system will need to operate, the treated effluent will be flushed through the areas of the site with VOC-contaminated soils. A treatability study will be required to determine the process effectiveness and necessity for adding surfactants to the flushing fluid for aid in contaminant removal. Contaminants are recovered by the groundwater extraction system and treated. The soil flushing has the effect of accelerating the natural process of soil flushing that would occur through rainfall infiltration. It is estimated that the flushing system would operate for a period of 15 years.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 4: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,306,875 Annual O&M Cost: \$ 291,000 Present Worth: \$5,582,499 Time to Implement: 15 years

To reduce the time required to operate the groundwater extraction and treatment system presented in Alternative 2, a soil vapor extraction (SVE) system would be used to remove the VOC contamination from the soil. The vapor extraction wells would be placed in the areas of the site with VOC-contaminated soils. The area surrounding the vapor extraction wells would be covered with approximately three feet of fill to increase the efficiency of the system by reducing the volume of air being pulled from above the ground surface. The air emissions will be treated to health-based levels. The SVE and groundwater extraction systems will operate in conjunction for approximately 15 years to meet the clean-up criteria.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 5: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND BIOLOGICAL TREATMENT OF VOC-CONTAMINATED SOIL/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$7,988,170
Annual O&M Cost: \$ 279,000
Present Worth: \$9,927,114
Time to Implement: 15 years

To reduce the operating time for the groundwater extraction and treatment system presented in Alternative 2, approximately 30,000 cubic yards of VOC-contaminated soils would be excavated and biologically treated on-site. Microorganisms, nutrients, and oxygen would be supplied to the contaminated soils to promote transformation and aerobic biological degradation of the VOC contaminants. The area available to construct the treatment facility is not large enough to accommodate all of the contaminated soil at one time. Therefore, the excavation, treatment and backfilling operations would need to be staged. It is estimated that soil treatment would take two to four years.

Since this alternative involves the excavation and placement of waste, the RCRA Land Disposal Restrictions (LDR) would be invoked. Therefore, the cost estimate assumes a minimum technology disposal unit would be constructed prior to redisposal of the excavated and treated soil.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 6: GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND ON-SITE INCINERATION OF VOC- AND PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$ 9,805,845
Annual O&M Cost: \$ 228,500
Present Worth: \$11,322,222
Time to Implement: 10 years

To minimize the operating time of the groundwater extraction and treatment system presented in Alternative 2, the VOC- and PAH-

contaminated soils would be excavated and incinerated on-site. Approximately 30,000 cubic yards of contaminated soil would be incinerated on-site using a mobile infrared unit. Based on an average process rate of 14,000 lb/hr, the incineration process would be completed in approximately nine to twelve months. It is estimated that the groundwater extraction system would operate for approximately ten years.

For costing purposes, it is assumed that the incinerator ash would not be a RCRA hazardous waste and could be backfilled onsite. Confirmatory sampling would be required prior to disposal. Waste sludge from the incinerator air scrubbers would, however, be considered hazardous and would thus require disposal at an approved RCRA facility.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 7: GROUNDWATER EXTRACTION AND DISCHARGE TO THE POTW/COVERING PAH-CONTAMINATED SOILS/CAPPING VOC-CONTAMINATED SOILS/EROSION CONTROLS/DEED RESTRICTIONS/MONITORING/CAPPING MUNICIPAL LANDFILL/REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost: \$3,571,980
Annual O&M Cost: \$ 298,500
Present Worth: \$6,385,960
Time to Implement: 30 years

This alternative is the same as Alternative 2, except that the extracted groundwater would be discharged to the POTW instead of air stripping and discharge to the Blue River. Consideration of this alternative would is based on the assumption that the Columbia City POTW is willing and able to accept the WRR site effluent. Currently the POTW does not have a pretreatment program with IDEM. The Columbia City POTW is scheduled for a capacity expansion in October 1990.

EVALUATION OF ALTERNATIVES

The preferred alternative for cleaning up the WRR site is Alternative 4 -- GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS. In addition, additional investigation will be conducted in the now inactive tank area and the lead-contaminated soil area (at SB-17 and SB-17A) to determine the extent of remediation. Based on current information, this alternative would appear to provide the best balance of trade-offs among the alternatives with respect to U.S. EPA's nine evaluation criteria. This section discusses the performance of the preferred alternative

against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is contained in Table 1.

Analysis

Overall Protection. All of the alternatives, with the exception of the "no action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment or engineering controls. The preferred alternative would treat the volatile organic contaminants in the soil and groundwater, cover the PAH-contaminated soil, and cap the municipal landfill to reduce the risks associated with direct contact and ingestion of contaminated soils and/or groundwater.

Because the "no action" alternative is not protective of human health and the environment, it is not considered further in this analysis as an option for this site.

Compliance with ARARs. All alternatives would meet their respective applicable or relevant and appropriate requirements of Federal and State environmental laws. Since the preferred alternative would not involve the excavation and placement of waste, LDR would not be an ARAR. However, all options would involve the relevant and appropriate RCRA requirements.

Discharge of the treated groundwater to the Blue River would meet the State's NPDES discharge limits. No waiver from ARARS is necessary to implement any of the active cleanup options. Soil clean-up levels will be established to ensure that contaminant leaching into the groundwater will not exceed health-based levels or MCLs.

Long-term effectiveness and permanence. The preferred alternative would reduce the inherent hazards posed by the VOC-contaminated soil and groundwater through treatment. SVE would be an effective method to reduce contaminant levels in soils because the primary contaminants are VOCs. In addition, the soil cover over the PAH- and VOC-contaminated soils would eliminate the direct contact threat associated with these areas. Removal of the tank contents would eliminate the potential for additional contamination of the surrounding soil and groundwater due to leaks or spills from the tanks.

Alternative 3 would also be effective in reducing site risks. However, potential complications with soil flushing are the controls required to lower the water table to induce upward gradients from the lower aquifer, while at the same time flush soils above the water table. In addition, the heterogeneous nature of the soils in the southeast area of the site may cause the drainage gallery to backup and discharge to the surface.

TABLE 1

GLOSSARY OF THE NINE CRITERIA

Community Acceptance will be assessed in the Record of Decision following a review of the public comments received on the RI/FS report and the Proposed Plan.

Compliance with ARARs addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or requires uses of a waiver.

Cost

includes capital and operation and maintenance costs.

Implementability

is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.

Long-term Effectiveness and Permanence refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.

Overall
Protection of
Human Health and
the Environment

addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.

Reduction of Toxicity, Mobility, and Volume is the anticipated performance of the treatment technologies a remedy may employ.

Short-term Effectiveness involves the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.

State Acceptance indicates whether, based on its review of the RI/FS, Proposed Plan, and public comments, the State agency concurs, opposes, or has no comment on the preferred alternative.

Alternatives 5 and 6 would effectively reduce site risks through treatment; however, land disposal of the treated material or ash would require long-term O&M.

Alternatives 2 and 7 would eliminate the direct contact threat; however, the inherent hazards of the waste will remain. The municipal landfill cap and groundwater monitoring system will require long-term O&M for all alternatives. Alternatives 5 and 6 are the only alternatives that would actively treat the PAH-contaminated soil, for all other alternatives these soils would be consolidated under the municipal landfill cap.

Reduction of toxicity, mobility, or volume of the contaminants through treatment. Only four of the alternatives would treat the principal threat of VOC-contaminated soil to reduce toxicity, mobility, or volume. The preferred alternative and alternative 3 would involve treatment of the VOC-contaminated soil via SVE or soil flushing in conjunction with groundwater extraction and treatment.

Alternatives 5 and 6 would involve biological treatment or incineration that would permanently destroy the VOC and PAH contaminants. The treated soil or contaminated ash would; however, be disposed of in a RCRA landfill.

Alternatives 2 and 7 achieve no reduction in toxicity, mobility, or volume for the VOC-contaminated soils.

It should be noted that although the cap over the municipal landfill and PAH-contaminated soil does not afford a reduction in toxicity, mobility, or volume, it would significantly reduce infiltration and the production of leachate that could migrate off-site.

Short-term effectiveness. The preferred alternative and Alternative 3 would require approximately 15 years to achieve the groundwater clean-up levels. Although Alternatives 5 and 6 would achieve groundwater clean-up levels quicker, both of these alternatives require excavation which would pose some short-term risks of exposure to VOCs during the excavation process. In addition, rainfall infiltration will be immediate during the construction period. This could increase the migration of contaminants in the groundwater. Groundwater clean-up levels would not be achieved for 30 years for Alternatives 2 and 7.

Implementability. The individual technologies described for each of the alternatives are conventional and well demonstrated. However, there is some concern over the technical feasibility of Alternative 3 given the heterogeneous nature of the soils. Conversely, the preferred alternative, which involves SVE has been found to be feasible for a variety of soil conditions.

No unusual difficulties in the placement of the soil cover and municipal landfill cap are anticipated. However, given the close proximity of the PAH-contaminated soil to the municipal landfill the feasibility of constructing two caps is questionable. It may be more appropriate to just incorporate the PAH-contaminated soil under the municipal landfill cap.

Implementation of Alternative 7 would require the consent of Columbia City for use of its POTW.

Cost. The present-worth cost of the preferred alternative is \$5,582,500. The lowest-cost alternative is Alternative 3 at \$5,110,800. The highest-cost alternative is Alternative 6 at \$11,322,200. Alternatives 2, 5 and 7 have present-worth costs of \$5,483,700, \$9,927,100, and \$6,386,000, respectively.

State acceptance. The State of Indiana Department of Environmental Management supports the preferred alternative.

Community acceptance. Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

Summary of the Preferred Alternative

In summary, Alternative 4 would achieve substantial risk reduction through treatment of the principal threat remaining at the site (i.e., the VOC-contaminated soil, groundwater, and tank contents) and by providing safe management of other material that will remain at the site. Given its effectiveness and implementability, Alternative 4 achieves this risk reduction in a comparable or smaller timeframe and cost than the other treatment options. Therefore, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the evaluation criteria. the information available at this time, U.S. EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would treat the VOC-contaminated soil and groundwater, the remedy also would meet the statutory preference for the use of a remedy that involves treatment as a principal element.

THE COMMUNITY'S ROLE IN THE SELECTION PROCESS

U.S. EPA solicits input from the community on the cleanup methods proposed for each Superfund response action. U.S. EPA has set a public comment period from January 22, 1990 through February 21, 1990 to encourage public participation in the selection process. The comment period includes a public meeting at which U.S. EPA

and IDEM will present the FS report and the Proposed Plan, answer questions, and receive both oral and written comments.

The public meeting is scheduled for Wednesday, February 7, 1990 at 7:00 p.m. and will be held at:

Council Room, City Hall 112 South Chauncey Columbia City, Indiana

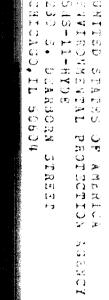
Comments will be summarized and responses provided in the Responsiveness Summary section of the Record of Decision (ROD). The ROD is the document that presents U.S. EPA's final selection for cleanup. The public can send written comments to or obtain further information from:

Tinka G. Hyde
Remedial Project Manager
U.S. EPA - 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604
(312) 886-9296

Toll free (800) 621-8431 between 9:00 a.m. and 4:30 p.m. Central Time

U.S. EPA and IDEM are soliciting public comments about the most acceptable way to clean up the Wayne Reclamation and Recycling site. The Proposed Plan and the RI/FS Reports have been placed in the Information Repositories and Administrative Record for the site. The Administrative Record includes all documents such as work plans, data analyses, public comments, transcripts and other relevant material used in developing the remedial alternatives for the Wayne Reclamation and Recycling site. These documents are available for public review and copying at the following locations:

City Hall 112 South Chauncey Columbia City, IN Peabody Library 203 North Main Columbia City, IN.





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